

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, *

Plaintiffs, *

v. * Civil Case No. 16-cv-3311-MJG

LAWRENCE HOGAN, *et al.*, *

Defendants. *

* * * * *

**CONSENT MOTION TO EXTEND THE DEADLINE
FOR DEFENDANTS TO MAKE THEIR EXPERT DISCLOSURES**

Defendants, Governor Lawrence J. Hogan and Superintendent of Maryland State Police William M. Pallozzi, sued in their official capacity (“Defendants”), by their attorneys and with the consent of Plaintiffs, hereby move for an order extending defendants’ deadline to make their expert disclosures until May 25, 2018 and state as follows:

1. On September 25, 2017, this Court entered a Scheduling Order in this case. (Doc. No. 36)

2. On March 22, 2018, the parties filed a joint motion to amend the scheduling order to extend the deadlines for the completion of discovery and other pre-trial matters by two weeks, which the Court granted. (Doc. No. 52)

3. Pursuant to the Amended Scheduling Order, Plaintiffs were required to make their Rule 26 (a) (2) expert disclosures on April 16, 2018 and provide dates within 21 days when the experts were available for deposition.

4. On April 16, 2018, plaintiffs designated two experts. Counsel agreed to conduct the depositions of plaintiffs' two experts within 21 days, as contemplated by the Amended Scheduling Order.

5. However, the deposition of one of plaintiffs' experts, Professor Gary Kleck, had to be postponed because Professor Kleck's flight to the April 27, 2018 deposition was cancelled.

6. Due to a pre-planned trip, Professor Kleck is not available for the deposition until May 18, 2018, which is outside of the 21-day period established by the Court for completing expert depositions and after defendants are required to make their expert disclosures on May 15, 2018.

7. Accordingly, counsel for the parties have agreed to extend the deadline for defendants to designate their experts to May 25, 2018. This will enable the parties to complete the depositions of plaintiffs' experts before defendants are required to make their expert disclosures, as contemplated by the original Scheduling Order and the Amended Scheduling Order.

8. All other deadlines will remain the same, and no party will be prejudiced by this 10-day extension of the defendants' deadline to make their expert disclosures.

WHEREFORE, defendants respectfully request that the Court enter the attached proposed order extending defendants' deadline to make their expert disclosures until May 25, 2018.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

/s/ Robert A. Scott

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April 30, 2018

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April, 2018, a copy of the foregoing
Consent Motion was filed via ECF and thereby served on all counsel of record.

/s/ Robert A. Scott

Robert A. Scott